

Petitioners in the two actions, as counsel for the *Hoeg* Petitioners could have done prior to the filing of their Petition.

3. The *Wallrich* Petitioners suggest that Respondents should have provided email addresses for the overlapping Petitioners. (*See* ECF No. 42, at ¶ 4 n.2.) The list of potentially overlapping Petitioners attached to Respondents' Motion (ECF No. 40-3) was generated using the publicly-filed lists of Petitioners in the two actions (*Wallrich* ECF No. 1-2, *Hoeg* ECF No. 1-1), which do not include email addresses. Counsel for Petitioners have those addresses if they wish to refer to them.

4. Respondents disagree with the *Hoeg* Petitioners' implication that the Motion would have been unnecessary "had Respondent's counsel simply picked up the phone and asked." (ECF No. 41, at 3.) Local Rule 40.4 quite properly does not permit reassignment of an action by stipulation of the parties, but instead provides a protocol for raising the question of reassignment with the Court. Respondents proceeded in accordance with that protocol.

5. The *Hoeg* Petitioners' putative description of a confidential mediation proceeding between Respondents and the *Hoeg* Petitioners is entirely unnecessary to their Response. (*See* ECF No. 41, at 1.) Accordingly, Respondents will not comment further on that description here other than to note that it is not at all accurate, and Respondents do not agree with it.

Dated: April 10, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 10th day of April, 2023, he caused the foregoing Respondents' Reply To Responses To Motion For Reassignment Of Related Case to be filed with the Clerk of the District Court via the CM/ECF system, which will send notification of such filing to all counsel of record in *Wallrich* at the email addresses on file with the Court.

The undersigned further certifies that on that same day, he caused a copy of the foregoing Respondents' Reply to Responses to Motion For Reassignment Of Related Case to be served by electronic mail to all counsel of record in the action captioned *Melanie Hoeg et al. v. Samsung Electronics America, Inc. et al.*, which is docketed as Civil Action No. 1:23-cv-1951 in this Court, as follows:

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